Patrick E.Winchester
Electro-Coat Technologies
P.O.Box 894
Elkhart, IN 46515

Re: 039-12763
Amendment to Construction Permit
CP: 039-9800, Plt ID: 039-00498

Dear Patrick E.Winchester:

Electro-Coat Technologies was issued a Construction Permit on August 13, 1998 for electroplating operation for metal frames for modular homes and motor vehicles. A letter requesting descriptive changes was received on September 25, 2000. The permit is hereby amended as follows:

The existing equipment descriptions that require amendment are as follows:

(a) thirty-five (35) radiant heaters, natural gas fired, identified as IR1-1 to 23, IR2-1 to 6 and IR3-1 to 6, with a heat input capacity of 0.2, 0.15, and 0.2 MMBtu per hour, each, respectively, exhausting to stacks, not identified,

(b) eighty-five (85) Mig welders with a maximum consumption of 0.59 pound per hour of wire, per station, exhausting to a stack through an exhaust fan EF-13,

(c) four (4) make-up air units, natural gas fired, identified as MUA1-1 through 4, with a heat input capacity of 5.3 MMBtu per hour, each, exhausting to stacks, not identified,

(d) four (4) bake ovens, natural gas fired, identified as BK-1 through 4, with a heat input capacity of 3.5 MMBtu per hour, each, exhausting to stacks S3 through S6,

(e) two (2) water heaters, natural gas fired, identified as WH1 through 2, with a heat input capacity of 0.4 MMBtu per hour, each, exhausting to stacks, not identified,

(f) one (1) pre-treatment system consisting of two (2) natural gas fired ovens, with a total heat input capacity of 8.0 MMBtu per hour, and using 166.8 pounds per hour of aqueous cleaners, aqueous rinse and phosphate solution, each, and exhausting to vent stacks S1, S2 and EF1 thru EF4; and

(g) electrocoating process operation with a maximum resin use of 181.2 pounds per hour, method of application is by dipping and exhausting to a vent stack EF5.

The amended equipment description is as follows:

(a) thirty-five (35) radiant heaters, natural gas fired, identified as IR1-1 to 23, IR2-1 to 6 and IR3-1 to 6, with a heat input capacity of 0.2, 0.15, and 0.2 MMBtu per hour, each, respectively, exhausting to stacks, not identified,

(b) eighty-five (85) Mig welders with a maximum consumption of 0.59 pound per hour of wire,

per station, exhausting to a stack through an exhaust fan EF-13,

(c) four (4) make-up air units, natural gas fired, identified as MUA1-1 through 4, with a heat input capacity of 5.346 MMBtu per hour, each, exhausting to stacks, not identified,

(d) one (1) bake ovens, natural gas fired, identified as BK-1, with a heat input capacity of 14 MMBtu per hour, exhausting to stack S3,

(e) two (2) water heaters, natural gas fired, identified as WH1 through 2, with a heat input capacity of 0.4 MMBtu per hour, each, exhausting to stacks, not identified,

(f) one (1) pre-treatment system consisting of two (2) natural gas fired ovens, with a total heat input capacity of 14 MMBtu per hour, and using 166.8 pounds per hour of aqueous cleaners, aqueous rinse and phosphate solution, each, and exhausting to vent stacks S1, S2 and EF1 thru EF4,

(g) electrocoating process operation with a maximum resin use of 181.2 pounds per hour, method of application is by dipping and exhausting to a vent stack EF5, and

(h) one (1) sealer/curing oven, CO-1, natural gas fired, with a heat input capacity of 1.6 MMBtu per hour.

The above changes are based on information provided by the Permittee in the Affidavit of Construction. The increase in the maximum capacity for the equipment amounts to 7.6 MMBtu/hour. This will cause potential to emit increase for all criteria pollutants below the exemption thresh-hold as shown in the attached calculations.

The Permittee has also requested to change the name of the facility from “Venture Welding, Inc.” to Electro-Coat Technologies. The mailing address to be changed to P.O.Box 894 Elkhart, IN 46515. These changes are implemented and a new title page for the permit is attached to this letter.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit page to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
GS
cc: File – Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Electro-Coat Technologies
53375 County Road 13
Elkhart, Indiana 46516

is hereby authorized to construct and operate

a plant consisting of an electrocoating operation of metal frames for modular homes and motor vehicles.

The equipment is listed in the Page 2 of this permit.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-039-9800-00498	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: August 13, 1998

Amendment: 039-12763	Pages Affected: 2
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

(a) thirty-five (35) radiant heaters, natural gas fired, identified as IR1-1 to 23, IR2-1 to 6 and IR3-1 to 6, with a heat input capacity of 0.2, 0.15, and 0.2 MMBtu per hour, each, respectively, exhausting to stacks, not identified,

(b) eighty-five (85) Mig welders with a maximum consumption of 0.59 pound per hour of wire, per station, exhausting to a stack through an exhaust fan EF-13,

(c) four (4) make-up air units, natural gas fired, identified as MUA1-1 through 4, with a heat input capacity of 5.346 MMBtu per hour, each, exhausting to stacks, not identified,

(d) one (1) bake oven, natural gas fired, identified as BK-1, with a heat input capacity of 14 MMBtu per hour, each, exhausting to stacks S3,

(e) two (2) water heaters, natural gas fired, identified as WH1 through 2, with a heat input capacity of 0.4 MMBtu per hour, each, exhausting to stacks, not identified,

(f) one (1) pre-treatment system consisting of two (2) natural gas fired ovens, with a total heat input capacity of 14 MMBtu per hour, and using 166.8 pounds per hour of aqueous cleaners, aqueous rinse and phosphate solution, each, and exhausting to vent stacks S1, S2 and EF1 thru EF4; and

(g) electrocoating process operation with a maximum resin use of 181.2 pounds per hour, method of application is by dipping and exhausting to a vent stack EF5

(h) one(1) sealer/curing oven CO-1 natural gas fired, with a heat input capacity of 1.6 MMBtu per hour.

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Electro-Coat Technologies**
Address City IN Zip: **53375 County Road 13, Elkhart IN 46516**
CP: **039-12763**
Plt ID: **039-000498**
Reviewer: **Gurinder Saini**
Date: **October 14, 2000**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.6	66.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	3.3	0.2	2.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.990E-05	3.995E-05	2.497E-03	5.992E-02	1.132E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.664E-05	3.662E-05	4.660E-05	1.265E-05	6.990E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.